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Counsel for Defendant Eli Lilly and Company

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

NEKTAR THERAPEUTICS,

Plaintiff/Counter-Defendant,

v.

ELI LILLY & CO.,

Defendant/Counter-Claimant.

CASE NO. 3:23-CV-03943-JD

**DEFENDANT ELI LILLY AND
COMPANY'S INTERIM
ADMINISTRATIVE MOTION TO SEAL**

Judge: Hon. James Donato

1 Pursuant to Civil Local Rules 7-11 and 79-5, Paragraph 31 of this Court’s Standing Order for Civil
2 Cases, and the Stipulation and Order Modifying Sealing Procedures Related to Dispositive Motions and
3 Daubert Motions (the “Stipulation and Order”) entered by the Court on May 22, 2025 (Dkt. 192),
4 Defendant Eli Lilly and Company (“Lilly”) hereby submits this Interim Administrative Motion to file
5 under seal the unredacted versions of Lilly’s Motions *in Limine*, a subset of Exhibits 1-5 to the
6 corresponding Declaration of Ryan Moorman in their entirety, unredacted versions of select Nektar
7 Oppositions to Lilly’s Motions *in Limine*, and a subset of Exhibits 1-18 to the corresponding declaration
8 of Jimmy Bieber in their entirety.

9 The parties anticipate that following the Court’s ordinary procedures would require voluminous
10 sealing motions related to the parties’ Motions *in Limine*, their respective oppositions and exhibits filed
11 in support, and other pre-trial filings made on this day, September 25, 2025. Pursuant to Paragraph 31 of
12 this Court’s Standing Order and as set forth in the Stipulation and Order (Dkt. 192), the Parties therefore
13 intend to file a single, more fulsome sealing motion (“Omnibus Sealing Motion”) covering the pretrial
14 filings submitted under seal on September 25, 2025. To facilitate the process of submitting an Omnibus
15 Sealing Motion and to reduce the burden on both the Court and the Parties, Lilly respectfully requests that
16 the documents filed provisionally under seal herewith be maintained under seal pending a decision by the
17 Court on the parties’ forthcoming Omnibus Sealing Motion, to be filed no later than thirty days after the
18 conclusion of trial.

1 DATED: September 25, 2025

Respectfully submitted,

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3 s/ Ryan J. Moorman, P.C.

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